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RECEIVED

July 29, 2003

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

Marlene H Dortch, Secretary
Federal Communications Commission
445 12th Street S W
Washington, D C 20554

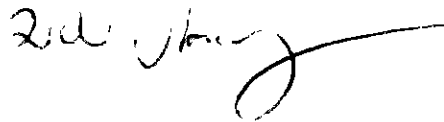
Re **WT Docket 94-102**
Amendment of E-911 Phase 2 Implementation Plan
Virginia Cellular LLC d/b/a Cellular One
TRS # 812367

Dear Ms Dortch

On behalf of the above-referenced carrier, and pursuant to Section 20.18(i) of the Commission's Rules, enclosed is a narrative statement regarding the company's amended E-911 Phase II implementation plan

If you have any questions regarding this filing, please contact the undersigned

Very truly yours,



Todd Slamowitz

cc Policy Division, Wireless Telecommunications Bureau, FCC (w/ enclosure)

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LUCAS GUTIERREZ 07-29-03

**VIRGINIA CELLULAR LLC
d/b/a CELLULAR ONE**

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Federal Communications Commission
Office of the Secretary

WT Docket 94-102

Amended E-911 Phase II Implementation Plan Report

Background/Contact Information

(1) Carrier Identifying Information

Virginia Cellular LLC
d/b/a Cellular One
TRS # 812367

(2) Contact Information

Name & Address Laura Stickley, 121 S Augusta Street, Staunton, VA 24401
Phone (540) 886-1065
Fax (540) 886-1068
Email lstickley@clv.net

E911 Phase II Location Technology Information

(1) Type of Technology

Virginia Cellular LLC ("Virginia Cellular") d/b/a Cellular One provides wireless services in rural Virginia, operating on a CDMA network. On November 7, 2000, Virginia Cellular filed its initial E911 Phase II Carrier Implementation Report, indicating that it intends on using a network-based technology to meet the Commission's Phase II E911 requirements. However, the lack of availability from manufacturers of equipment capable of meeting the Phase II location accuracy requirements has become a major obstacle to the successful deployment of a network-based technology in its service area. Also, Virginia Cellular has concerns regarding accuracy and reliability utilizing a network-based solution in rural service areas.

Hence, Virginia Cellular has determined that a handset-based technology to be the most practical means to make available Phase II services in its operating areas. Virginia Cellular has had discussions with some of the major handset manufacturers for CDMA, and has determined that a handset approach will be more efficient. Virginia Cellular continues to receive and is in the process of evaluating available products that would enable them to deploy a handset-based technology for Phase II.

(2) Testing and Verification

Virginia Cellular has not itself conducted tests of Phase II technology. It will review and evaluate the test results and accompanying technical information provided by potential providers of equipment, services and software. Virginia Cellular will adopt its own testing and verification methods and procedures based on sound engineering and statistical practices, referring to the principles and standards set forth in OET Bulletin 71. This testing and verification will likely be incorporated into routine testing by company technicians once a handset-based solution has been implemented.

(3) Implementation Details and Schedule

It is Virginia Cellular's intention to begin selling and activating location-capable handsets no later than September 1, 2003. It expects that Phase II service will first be available in its network by November, 2004. Virginia Cellular will notify the FCC of any change in its schedule for implementation. Virginia Cellular recognizes that the Commission's current rules require the deployment of a Phase II system, even if none exists which fully meets the Commission's accuracy requirements.

(4) PSAP Interface

Virginia Cellular intends to work with each PSAP to mutually determine the best method of delivering Phase II information to that PSAP. Virginia Cellular anticipates additional hardware and software upgrades to be required, however, the specifications and schedule have not been finalized.

(5) Existing Handsets

It is anticipated that Virginia Cellular's handset-based solution will create a Phase II capability that will provide enhanced ALI information from the commencement of implementation.

(6) Location of Non-Compatible Handsets

It is Virginia Cellular's intention to employ a handset-based solution that will ensure that E911 calls coming from handsets that are incompatible with its technology solution will be delivered to the PSAP with E911 Phase I information.

(7) Other Information

Virginia Cellular remains dedicated to implementation of E911 Phase II ALI capabilities that comply with the Commission's accuracy requirements to the greatest degree technically possible. While Virginia Cellular cannot control equipment availability or vendors' delivery schedules, it will

work diligently to timely implement a handset-based E911 Phase II solution for its CDMA network.

At this time, Virginia Cellular has received a Phase II deployment request from Harrisonburg/Rockingham County, Virginia